

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-8205-WM

UNITED STATES OF AMERICA

vs.

VIRGINIA ELENA CIORECAN,


Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard)? No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,  
JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

BY:

  
for Marton Gyires

Assistant United States Attorney  
Court ID No. A5501696  
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West Palm Beach, Florida 33401  
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AO 91 (Rev. 08/09) Criminal Complaint

FILED BY KJZ D.C.**May 20, 2022**ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - West Palm Beach

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

Virginia Elena Ciorecan,

Case No. 22-8205-WM

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/08/2021 through 8/12/2021 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 1349	Conspiracy to commit bank fraud.
Title 18, United States Code, Section 1344	Bank fraud.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.
  
 Complainant's signature

 Anthony Arena, Special Agent, U.S Postal Service  
 Printed name and title

SWORN and ATTESTED to me by Affiant by Telephone-Facetime per Fed.R.Crim.P. 4(d) and 4.1

Date: May 20, 2022
  
 Judge's signature
City and state: West Palm Beach, FL
 William Matthewman, U.S. Magistrate Judge  
 Printed name and title

**AFFIDAVIT**

I, Anthony Arena, being duly sworn, depose and state as follows:

1. I am a U.S. Postal Inspector with the United States Postal Inspection Service ("USPIS"), currently assigned to the Miami Division's West Palm Beach Domicile. I have been an Inspector for USPIS since July 2014. My responsibilities include investigations concerning theft of mail, identify theft, mail fraud, and bank fraud. I have received training in criminal investigation procedures and criminal law and have conducted numerous criminal investigations involving the theft of mail and bank fraud.

2. The facts contained in this affidavit are based on my personal knowledge and information provided to me by other agents, inspectors, law enforcement officers. This affidavit is being submitted for the limited purpose of establishing probable cause that VIRGINIA ELENA CIORECAN ("CIORECAN") committed bank fraud conspiracy and bank fraud in violation of Title 18, United States Code, Sections 1344 and 1349. The facts set forth herein do not constitute all the facts known to law enforcement officers regarding this matter.

3. The USPIS was referred this case from a Truist Bank Investigator. Truist Bank records indicated that two Truist accounts were opened in the names of M.I. and A.M. Both accounts showed several checks deposited into the accounts, that were made out to churches, schools, and businesses; not the Truist account holders, M.I. or A.M. ATM surveillance images were provided of CIORECAN and Catalin Trandafir, who were unidentified at that time.

4. Customs and Border Patrol conducted a facial recognition search on the ATM surveillance images and provided a match to CIORECAN and Trandafir as persons previously attempting to enter the U.S. via El Paso, TX in April 2021. Your affiant sent the ATM surveillance images to Pasco County Sheriff's Office (PCSO) Deputies who had previous contact with CIORECAN and

Trandafir. The PCSO Deputies confirmed the individuals in the ATM surveillance images were CIORECAN and Trandafir.

5. On June 8, 2021, a Truist bank account under the name M.I. was opened under account number x5757. The account was opened using a Romania Passport #057896304 and a Romania Identity Card #2850105371028, both in M.I.'s name. Truist bank provided photocopies of the identification documents used to open the account and CIORECAN's picture is depicted in the passport and identity card. The date of birth used for the M.I. account was January 5, 1985 with a mailing address of 231 Tulip Tree Drive in Lake Worth, FL.

6. On June 22, 2021, a Truist bank account under the name A.M. was opened under account number x1785. The account was opened using a Romania Passport #038497632 in A.M.'s name. Truist bank provided photocopies of the identification document used to open the account and CIORECAN's picture is depicted in the passport. The date of birth used for the A.M. account was April 20, 1985 with a mailing address of 231 Tulip Tree Drive in Lantana, FL.

7. Truist Bank conducted a search under CIORECAN's real name and discovered an account x7585 opened on November 15, 2021. The account was opened using a Romania Passport #058607977 and a Romania Identity Card #2851223162031, both in CIORECAN's name. Truist bank provided photocopies of the identification documents used to open the account and CIORECAN's picture is depicted in the passport and identity card. The date of birth used for CIORECAN's account was her true date of birth, December 23, 1985, and had a mailing address of 314 Douglass Ave in West Palm Beach, FL.

8. Your affiant reviewed the deposits and withdrawals that were made into the M.I. and A.M. Truist accounts. Your affiant determined twelve checks totaling approximately \$57,540.50 were deposited via ATMs between July 16, 2021 and August 12, 2021. The checks that were deposited



into the accounts were from Mississippi, Missouri, and Indiana and were made payable to churches, schools, and businesses. Your affiant determined nine withdrawals for approximately \$33,700.00 were conducted between July 16, 2021 and August 12, 2021. CIORECAN was observed in five of the withdrawals for approximately \$18,200.00.

9. On July 20, 2021 at 11:28 AM, CIORECAN deposited check number 9293 for \$300.00 into the A.M. account x1785 at the Truist Bank in Lantana, FL. Check 9293 was drawn under the Trustmark Bank account x9866 in the name of C.W. and N.W. of Ridgeland, MS. The check was made payable to St. Columbus Church and dated July 13, 2021. On April 18, 2022, C.W. owner of check 9293 was interviewed via telephone. C.W. stated that check 9293 was mailed via USPS. C.W. stated he was unaware that check 9293 was stolen and thought it arrived at the St. Columbus Church. C.W. stated that he does not know A.M. or CIORECAN and he did not give them permission to deposit his check into the A.M. account. The deposit was captured on ATM surveillance images and showed CIORECAN making the deposit into the A.M. account.

10. On July 21, 2021 at 10:58 AM, CIORECAN conducted a withdrawal in the amount of \$2,500.00 from the M.I. account x5757 at the Truist Bank in Lantana, FL. The withdrawal was captured on ATM surveillance images and showed CIORECAN making the withdrawal from the M.I. account.

11. On July 21, 2021 at 12:30 PM, CIORECAN deposited check number 3586 for \$6,080.00 into the M.I. account x5757 at the Truist Bank in Boynton Beach, FL. Check 3586 was drawn under the Commerce Bank account x2386 in the name of A.G. Laramore LLC of Saint Louis, MO. The check was made payable to Elite Family Chiropractic Center and dated June 15, 2021. On April 8, 2022, A.L. owner of check 3586 was interviewed via telephone. A.L. stated the check 3586 was mailed via USPS. A.L. stated Elite Family Chiropractic Center is on campus or adjacent

to a church who had reported issues of mail theft to A.L. during the time he mailed the check. A.L. stated that he does not know M.I. or CIORECAN and he did not give them permission to deposit his check into the M.I. account. The deposit was captured on ATM surveillance images and showed CIORECAN making the deposit into the M.I. account.

12. On July 23, 2021 at 9:10 AM, CIORECAN conducted a withdrawal in the amount of \$5,000.00 from the M.I. account x5757 at the Truist Bank in Boynton Beach, FL. The withdrawal was captured on ATM surveillance images and showed CIORECAN making the withdrawal from the M.I. account.

13. On July 29, 2021 at 9:27 AM, CIORECAN conducted a withdrawal in the amount of \$3,700.00 from the M.I. account x5757 at the Truist Bank in Lantana, FL. The withdrawal was captured on ATM surveillance images and showed CIORECAN making the withdrawal from the M.I. account.

14. On August 2, 2021 at 10:29 AM, CIORECAN conducted a withdrawal in the amount of \$5,000.00 from the M.I. account x5757 at the Truist Bank in Boynton Beach, FL. The withdrawal was captured on ATM surveillance images and showed CIORECAN making the withdrawal from the M.I. account.

15. On August 4, 2021 at 9:54 AM, check number 335 for \$8,700.00 was deposited into the A.M. account x1785 at the Truist Bank in Boynton Beach, FL. Check 335 was drawn under the Bancorp South account x1743 in the name of L.M. of Madison, MS. The check was made payable to the St. Augustine School and dated July 30, 2021. On April 8, 2022, L.M. owner of check 335 was interviewed via telephone. L.M. stated that check 335 was either mailed via USPS or placed directly in the mailbox at the St. Augustine School. L.M. stated the St. Augustine School contacted him about the missing payment that was never received. L.M. checked his Bancorp South account

and observed check 335 cleared. L.M. stated that he does not know A.M., CIORECAN, or Trandafir and he did not give anyone permission to deposit his check into the A.M. account. The deposit was not captured on ATM surveillance images, it is unknown who made the deposit into the A.M. account under CIORECAN's control.

16. On August 12, 2021 at 2:44 PM, Trandafir deposited check number 4009 for \$11,050.00 into the A.M. account x1785 at the Truist Bank in West Palm Beach, FL. Check 4009 was drawn under the Bank of Brookhaven account x0066 in the name of B.S. of Madison, MS. The check was made payable to the St. Augustine School and dated July 5, 2021. On May 2, 2022, B.S. owner of check 4009 was interviewed via telephone. B.S. stated that check 4009 was mailed via USPS to the St. Augustine School. B.S. stated the St. Augustine School contacted him about the missing payment that was never received. B.S. checked his Bank of Brookhaven account and observed check 4009 cleared. B.S. stated that he does not know A.M., CIORECAN, or Trandafir and he did not give them permission to deposit his check into the A.M. account. The deposit was captured on ATM surveillance images, and it showed Trandafir making the deposit into the A.M. account.

17. Truist Bank is FDIC insured. Additionally, Truist Bank headquarters and their servers are in North Carolina.

18. Based on the above facts, I submit that there is probable cause to believe that VIRGINIA ELENA CIORECAN committed bank fraud conspiracy and bank fraud in violation of Title 18, United States Code, Sections 1344 and 1349.

FURTHER YOUR AFFIANT SAYETH NAUGHT

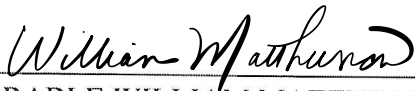


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ANTHONY ARENA, POSTAL INSPECTOR  
UNITED STATES POSTAL INSPECTION SERVICE

SWORN and ATTESTED to me by Affiant by Telephone-Facetime  
per Fed.R.Crim.P. 4(d) and 4.1 on this

20th day of May, 2022.



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HONORABLE WILLIAM MATTHEWMAN  
UNITED STATES MAGISTRATE JUDGE



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Virginia Elena Ciorecan

Case No: \_\_\_\_\_

**CRIMINAL COMPLAINT CHARGE:**

**Count 1:**

18 U.S.C. § 1349 - Conspiracy to commit bank fraud

**\* Max. Penalty:** Up to 30 years' incarceration; 5 years of supervised release; \$1 million fine, and a mandatory \$100 special assessment

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**Count 2:**

18 U.S.C. § 1344 - Bank fraud

**\* Max. Penalty:** Up to 30 years' incarceration; 5 years of supervised release; \$1 million fine, and a mandatory \$100 special assessment

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\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.